



7 March, 2014

Federal Communications Commission
445 12th Street, SW
Washington, DC 20554

Re: Expression of Interest – Rural CAF Experiment Program, Docket No. 10-90

To Whom It May Concern:

Central Utah Telephone, Inc., (CUT) on behalf of itself and its regulated affiliate companies, Skyline Telecom, Inc. (ST) and Bear Lake Communications, Inc., (BLC), collectively referenced herein as “CUT,” hereby submits to the Federal Communications Commission (FCC) this non-binding expression of interest in the Rural Broadband Trial, (the “Trial”) in Docket No. 10-90.

Brief Background of CUT: CUT is a one-hundred-eleven-year-old independent rural telephone company whose regulated exchange areas cover substantial portions of the counties of Sanpete, Carbon, Wasatch, Utah, Juab, and Tooele in central Utah, and Rich County in North Central Utah. Our regulated companies currently serve an aggregate total of approximately 6,105, wireline telephone and 3,831 broadband (DSL) subscribers.

CUT is a vertically integrated provider with a highly-efficient, cost-effective, in-house aerial and underground construction capability that recently (2013) constructed over 74 miles of underground middle-mile fiber-optic cable in remote Millard County, Utah, exclusively utilizing our in-house construction crews. The work, completed in less than three months, was performed pursuant to our BIP grant for the Basin Broadband Project (UT1103-A40).

Our subscriber base consists of 14 widely-spread communities ranging in population from approximately 250 to 3,400, and an extensive rural farm population. All communities are currently served with legacy copper wireline infrastructure. We provide our subscribers with the best broadband services that such legacy infrastructure can provide, but with such systems fast becoming obsolete as demand for broadband speeds to 50 Mbps and beyond are becoming more commonplace, we clearly recognize the need to replace this infrastructure with the robust reliability and super bandwidth capacities that only fiber-to-the-home (FTTH) can provide.

Geographic Territory: CUT proposes to provide FTTH services to residents, businesses and government entities lying within their exchange boundaries located in the census districts listed in the table below:



CUT	Skyline Telecom	Bear Lake Communications
Mt. Pleasant-Moroni CCD-92150	Mt. Pleasant-Moroni CCD-92150	Garden City-Laketown CCD-91032
Helper CCD-91333	Goshen CCD-91118	
	Eureka CCD-90946	
	Dugway Wendover CCD-90602	

Anchor Institutions:

Schools: CUT, through our non-regulated affiliate, already provides fiber optic gigabit level broadband services to the majority of schools in our exchanges. This has resulted in a fiber optic presence in most of our communities that can be leveraged into the backbone for a FTTH overbuild to all residential and commercial locations in those communities.

Libraries: We will serve public libraries in at least the communities of Mt. Pleasant, Fairview, Dugway, Wendover and Garden City. As other communities add public libraries, we will serve them as well.

Government Centers: An upgrade to FTTP infrastructure would greatly benefit every governmental institution in every community we serve. We have nine police departments, 14 City or Town Halls, 13 fire departments, and various state and federal government facilities or offices in our exchange areas. The single largest government institution we serve is the U.S. Army’s Dugway Proving Ground Facility and Michael Army Airfield. We serve all administrative, training and residential facilities at Dugway and Michael. A Trial project encompassing a FTTH overbuild for these facilities would not only be very much to the benefit of all who live and work at Dugway, but would be very much in the Government’s interest.

Indian Tribes: We currently serve one Indian Reservation, the Skull Valley Band of Goshute Indians, located in Skull Valley, Utah. The reservation is served by a fiber backbone, but lacks FTTH deployment that would greatly benefit the residents and provide enhanced communication capabilities for the Tribal Community Center which houses the reservation’s emergency services entities. In the process of planning a FTTH deployment on reservation land, we will consult with Tribal authorities to the maximum extent possible.

Health Centers/Hospitals: There are two (2) hospitals located within our exchanges, one of which we already provide with fiber optic connectivity. Additionally, there are 3 medical clinics, at least 3 mental health facilities and several county health department facilities, all of whom would benefit from the deployment of FTTH technology.



Proposed technology:

In a FTTH deployment, our offerings would include both legacy switched voice and VoIP telephony services. We would offer tiered high-speed broadband services for residents and businesses ranging from 10 Mbps to 100 Mbps, and make Gigabit service available to all who require it.

Telephony services would be priced in accordance with our then current tariffs, and broadband services (including VoIP), in accordance with our then current tiered service level offerings. Our system will incorporate current state-of-the-art optical technology and will be engineered to maximize efficient ground-level access to closures for our technicians.

Existing Providers:

We are the only existing wireline broadband services provider in our exchanges. We currently offer DSL broadband at a standard bandwidth of 6 Mbps down and 1 Mbps up. This offering is rapidly becoming inadequate for today's higher bandwidth demands. Our goal with a FTTH deployment is to provide a standard 15 Mbps down, with service tiers up to gigabit levels.

Project Timeline:

Aerial Deployment: In the case of aerial deployments within communities with whom we have existing franchise agreements, (approximately 80% of our subscriber base), we could commence aerial deployment almost immediately. If we were to fully deploy FTTH in all fourteen communities within our exchanges we estimate completion within 2 ½ to 3 years. Less than full deployment would require less time. All of our incorporated communities utilize primarily aerial infrastructure and would be considered "shovel-ready."

Underground Deployment: Underground projects outside the boundaries of our franchise communities will require engineering and permitting which could delay the commencement of construction up to three months. If any underground route touches U.S. Forest Service land or BLM land, the permitting process for such areas can range from six months to two years.

The actual timeline will depend on the scope of work the FCC would like us to perform under the Trial. Because of our ability to control and direct our own construction crews, we will be far more nimble and responsive to any timeline the FCC may require than most rural companies.

Scalability: Due to the flexibility afforded us by having our in-house construction capability, we have the ability to engage this Trial at any reasonable level of timeline performance the FCC may require; from construction of just a single community or rural area up to and including full deployment in all our exchanges.



Total Company Investment: Since we are unaware of what the scale of the project may be, CUT has not yet developed a project budget for this proposed Trial. We will provide the same upon notice from the FCC of exactly what the scope of work under the Trial will be.

One Time Capital Infrastructure Investment Needed: We cannot determine this amount until the FCC notifies us of what the scope of work will be for this Trial. We will provide that information as soon as we know the scope of work.

Total Project Cost: We cannot determine this amount until the FCC notifies us of what the scope of work will be for this Trial. We will provide that information as soon as we know the scope of work.

Respectfully submitted,

A handwritten signature in black ink, appearing to read "Eddie L. Cox".

Eddie L. Cox, President
Central Utah Telephone, Inc. et.al.

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